

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JONATHAN RINCON and
MARTIN GARCIA,
Plaintiffs,

v.

SYS-CON, LLC,
Defendant,

v.

H&B USA LLC, and PPE Trading Co. LLC
Third Party Defendants

CIVIL ACTION CASE NO. 4:24-cv-00194-
RSB-CLR

**SECOND JOINT MOTION FOR APPROVAL OF
FLSA SETTLEMENT AGREEMENTS**

Plaintiffs Jonathan Rincon and Martin Garcia (“Plaintiffs”) and Defendant Sys-Con LLC (“Defendant”)(collectively “the Parties”), by and through their undersigned counsel, respectfully request that this Court enter an Order approving the settlement reached in this case that is memorialized in the attached revised Settlement Agreement and Full and Final Release of Claims for Unpaid Wages, for each Plaintiff (“Settlement Agreements”). As set forth in the accompanying Memorandum of Law, the settlement among the Parties satisfies all factors required for approval in that it resolves bona fide disputes and is a fair and reasonable settlement and the Settlement Agreements have been revised to address procedural defects this Court cited in its July 18, 2025 Order Denying the initial motion filed by the Parties seeking approval of the FLSA Settlement Agreements. Therefore, the Plaintiffs and Defendant hereby respectfully request that this Court grant this Second Joint Motion and enter the proposed Order, attached, approving the Settlement Agreements.

Dated: August 8, 2025

Respectfully submitted,

/s/ Tessa Warren

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